

ATTACHMENT B

SALAM FAYYAD DEPOSITION TRANSCRIPT (7/28/2010)
ERRATA SHEET AND CERTIFICATE OF WITNESS

UNGAR, ET AL. v. THE PALESTINIAN AUTHORITY, ET AL.

Page	Line	Change	Reason for Change
6	14	"In Arabic, I think that's the translation" to "In Arabic, I think that's a different translation"	Clarify Record
12	13	"defense" to "defended"	Transcriptional Error
12	18	"ask" to "answer"	Clarify Record
13	19	"Mr. Wistow--" to "Mr. Wistow I object--"	Clarify Record
20	2	"That's my recollection, yes." to "To the best of my recollection, yes"	Clarify Record
26	2	A. Yes	Deletion
26	6	"I know what this case is generally about. I know" to "I know generally what this is about. I know"	Clarify Record

Page	Line	Change	Reason for Change
28	23	“understand” to “understood”	Transcriptional Error
29	17	“branch telling the judiciary what to do on the one hand,” to “telling the judiciary what to do on the one hand,”	Transcriptional Error
33	25	“If you want a stipulation--” to “If you want a stipulation, I was offering it to you--”	Clarify Record
34	7	“12-28-077” to “12-28-07”	Transcriptional Error
34	20	“vacate the judgment” to “vacate the default”	Clarify Record
37	4	“I really want to answer your questions.” to “I really do want to answer your questions.”	Clarify Record
40	11	“constant” to constantly”	Transcriptional Error
43	10	“Okay. Sure.” to “Okay. Fair enough”	Clarify Record

Page	Line	Change	Reason for Change
46	19	“We’re agreeing. The Answer to” to “No we’re agreeing just let me finish. The answer to”	Clarify Record
48	1	“Statement of Interest in a generic sense” to “statement of interest in a generic sense.”	Transcriptional Error
57	8	“wait” to “waste”	Clarify Record
59	3	“Oh, Please. I don’t want to” to “Oh, I don’t know. Oh, Please. I don’t want to”	Clarify Record
59	11	“out.” to “out briefly that would be great.”	Clarify Record
59	12	Mr. Wistow: Ok, why don’t we-- Mr. Rochon: Stay on the record	Addition
60	2	“we’re on the record. I’m just eating the” to “Mr. Prime Minister if you could step out please. We’re on the record. I’m just eating the”	Clarify Record
60	4	“lawyers they to use up the other guy’s time.” to “lawyers try to use up the other sides time. I’m	Clarify Record

Page	Line	Change	Reason for Change
		trying to let him know I'm not doing that."	
60	11	"to get money. He's trying to get security. He's trying" to "to get money. He's trying to tell them he's got security. He's trying"	Clarify Record
60	25	"I will not." to "I will not. I will not claim it as a waiver"	Clarify Record
61	10	"I'm offering it to you because" to "I can't make you but I'm offering it to you because"	Clarify Record
62	6	"here" to "him"	Transcriptional Error
64	11	"No. I'm not eating anything," to "No I don't have to eat this one. No. I'm not eating anything,"	Clarify Record
65	19	"get" to "go"	Transcriptional Error
74	1	"Understand what's going on." to "understood the substance of what's	Clarify Record

Page	Line	Change	Reason for Change
		going on.”	
74	7	“read it to him, you might just want him to be able to” to “read it to him, I just want him to be able to”	Transcriptional Error
96	14	“Are there things that he can do, other than” to “And I accept those, are there things that he can do, other than”	Clarify Record
98	13	“in a position to communicate with international on” to “in a position to communicate with international communities on”	Clarify Record
98	16	“Technically, it was really they have not” to “Technically, because they have not”	Transcriptional Error
98	17	“fulfilled the requirements under the Road Map stipulated” to “fulfilled the requirements under the Road Map as stipulated”	Transcriptional Error

Page	Line	Change	Reason for Change
99	7	“I believe it.” to “I believe it is”	Transcriptional Error
100	3	“That’s the position as I understand it.” to “That’s the position of the United States as I understand it.”	Clarify Record
103	8	“there” to “here”	Transcriptional Error
103	11	“Yes. As a matter of fact, this is 2006,” to “Yes. Because as a matter of fact, this is a 2006 letter,”	Clarify Record
103	12	“April 22, 2006” to “April 27, 2006”	Clarify Record
105	21	“do” to “know”	Transcriptional Error
106	12	“case” to “file”	Transcriptional Error
114	2	“Yes, because I just need to” to “Yes, because this is security I need to”	Transcriptional Error

Page	Line	Change	Reason for Change
115	5	<p>“Objection. We’re going to get into privileged areas” to A: “The declaration was prepared jointly by me and lawyers at Miller and Chevalier who are counsel for the PA and the PLO. Walid Najjab, who I have retained, through his company Management Consulting Services, to facilitate communication between myself and the U.S. attorneys retained to defend the PNA and PLO in litigation brought against them in the United States, was involved in communications between me and Miller and Chevalier regarding the declaration and its contents.”</p>	<p>The objection is hereby withdrawn and the responsive answer is provided.</p>
115	11	<p>“Objection. Don’t answer the question.” to “The declaration was prepared jointly by me and lawyers at Miller and Chevalier who are counsel for the PA and the PLO. Walid Najjab, who I have retained, through his</p>	<p>The objection is hereby withdrawn and the responsive answer is provided.</p>

Page	Line	Change	Reason for Change
		company Management Consulting Services, to facilitate communication between myself and the U.S. attorneys retained to defend the PNA and PLO in litigation brought against them in the United States, was involved in communications between me and Miller and Chevalier regarding the declaration and its contents.”	
115	19	“Whatever you say. Just.” to “Well that’s what you say. Just”	Transcriptional Error
119	5	“Same objections, and the answer” to “Same objections, any answer”	Transcriptional Error
125	18	A. I understand Q. It’s a very serious matter	Addition
127	10	“cannot tell you.” to “cannot really tell you.”	Transcriptional Error
136	5	“I don’t know. Typically, generally, first thing” to “Typically, generally, first	Clarify Record

Page	Line	Change	Reason for Change
		thing”	
141	19	“Can I just do this?” to “Well, counsel maybe we could-- can I just do this?”	Clarify Record
142	12	“symbol” to “simple”	Transcriptional Error
146	24	“and pass judgment on, if I can say legal counsel, in” to “and pass judgment on, efficacy of legal counsel, in”	Clarify Record
147	18	“I was not involved in the litigation early on. I” to “You know, I was not involved with directing this litigation early on”	Clarify Record
150	8	“Will you agree to submit to the Federal Court in” to “Will you agree to submit to the Jurisdiction of the Federal Court in”	Clarify Record
150	11	“It’s an argument.” to “It’s just an argument”	Transcriptional Error

Page	Line	Change	Reason for Change
151	13	"I mean I" to "And I"	Transcriptional Error
151	24	"I mean more than just a personal commitment made" to "And I understand for this to mean more than just a personal commitment made"	Clarify Record
152	2	"proceeds" to "succeeds"	Transcriptional Error
164	14	"You've got it already." to "Counsel, asked and answered. You've got it already."	Clarify Record
170	9	Mr. Wistow: You don't know who you asked?"	Addition
170	9	"Mr. Rochon: Counsel. Redundant" to "Mr. Rochon: Counsel, we've done this for 30 minutes"	Clarify Record
170	11	"Because you asked to." to "Only because you asked him to."	Transcriptional Error
171	1	"recollect a specific time and place, all this and that." to "recollect a specific	Clarify Record

Page	Line	Change	Reason for Change
		time and place, when you said what you said, and all of that.”	
172	19	“No doubt, none, that you knew that the First” to “Ok so there is absolutely no doubt, none, that you knew that the First”	Clarify Record
176	18	“Yes.” to “Yes as evidenced by this letter.”	Clarify Record
179	13	“conversation with him.” to “conversation with him more than once.”	Clarify Record
189	24	“Okay. Could he have gotten instructions from the” to “Okay. Could he have gotten permission from the or instructions from the”	Clarify Record
190	2	“take instructions from the” to “take directions from the office”	Clarify Record
193	16	“remember” to “really”	Transcriptional Error

Page	Line	Change	Reason for Change
193	19	“opposing” to “enforcing”	Transcriptional Error
195	6	“As a result of receiving?” to “As a result of receiving counsel?”	Transcriptional Error
204	2	“I’d like to get it all in one” to “I know but I’d like to get it all in one”	Clarify Record
210	17	“matters” to “areas”	Transcriptional Error
211	4	“deposition” to “position”	Transcriptional Error
214	6	“Q: Where do I talk about salaries?” to “A: Where do I talk about salaries?”	Transcriptional Error
216	11	“Q: Please feel free to ask me however many questions” to “A: Please feel free to ask me however many questions”	Transcriptional Error
223	23	“That was serious, and it continues to be.” to “and it continues to be.”	Clarify Record

Page	Line	Change	Reason for Change
229	25	“injection” to “injunction”	Transcriptional Error
231	7	“lawyers for the Pension Fund.” to “lawyers for the PMA and there are lawyers for the Pension Fund”	Clarify Record
232	19	“about so far--the PMA--” to “about so far--the PMA-- which has counsel”	Clarify Record
240	6	“record or off.” Either we’re stopping talking or--” to “record or off. If we are off the record we’re stopping taking, if we’re on the record--”	Clarify Record
260	2	“I mean in the sense of what’s going on, in terms” to “I mean in the sense the latest of what’s going on, in terms”	Clarify Record
260	12	“the Ministry of Finance. I mean I don’t think he does” to “the Ministry of Finance. I mean I don’t think I’ve seen him do”	Clarify Record
275	4	“Use whatever you want.” to “Use whatever term you want.”	Transcriptional Error

Page	Line	Change	Reason for Change
281	9	"Just for the record, make it" to "Just for the record, can we make it"	Transcriptional Error
281	10	"eight weeks, January 12 to mid-March, by my calculation." to "eight weeks, from January 12 to mid-March, by my count its eight weeks"	Clarify Record
282	4	"If you want to argue for the" to "If you want to argue the objections"	Clarify Record
282	5	"Judge, that means I'm going to have objections." to "that means I'm going to argue the objections"	Clarify Record
282	24	"definitely" to "basically"	Transcriptional Error
282	25	"already" to "letter"	Transcriptional Error
285	21	"Well, 12-12. That's what we agreed." to "Well, 12-12. I thought we agreed"	Transcriptional Error
290	11	"A government including Hamas?" to "In other words, a government including Hamas?"	Clarify Record

Page	Line	Change	Reason for Change
298	7	“2003” to “2002”	Transcriptional Error
315	10	“through” to “throughout”	Transcriptional Error
320	7	“That’s not evidence that Hamas” to “The facts that aren’t in evidence is the notion that Hamas”	Clarify Record
328	12	“no” to “to”	Transcriptional Error
336	10	“it” to “that”	Transcriptional Error
337	2	“anything” to “a”	Transcriptional Error
337	5	“representation” to “repetition”	Transcriptional Error
337	16	“this has taken long. My views are different than yours.” to “this has taken so long. My views are different than yours.”	Transcriptional Error

Page	Line	Change	Reason for Change
381	14	"within the European Union, the EU itself as an" to "within the European Union circles, the EU itself as an"	Transcriptional Error
385	13	"PLO" to "PA"	Transcriptional Error

I, SALAM FAYYAD, witness herein, do hereby certify and declare the within and foregoing transcription to be my examination under oath in said action taken on July 28, 2010; that I have read, corrected, and do hereby affix my signature under penalty of perjury to said examination under oath.



SALAM FAYYAD, Witness

17 / SEP / 2010
Date